

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
DURHAM DIVISION

IN RE:  
Robert Stancil Lockhart, Jr.  
Sherena Michelle McDonald Lockhart  
Debtors

Case Number: 10-81915  
Chapter 13

RESPONSE TO MOTION TO USE CASH COLLATERAL AND TO ALLOW  
SUBSTITUTION OF COLLATERAL

NOW COMES Home Credit Corporation, (hereinafter "Home Credit") and responding to the Motion to Use Cash Collateral and to Allow Substitution of Collateral filed by counsel for the Debtors, and shows unto the Court:

1. That Home Credit Corporation should be allowed to inspect any proposed substitute vehicle to ensure that it is an acceptable substitute for the current collateral.
2. That Home Credit Corporation has an interest in the insurance proceeds to the extent that the value of the substitute collateral does not fully secure Home Credit Corporation's claim.

WHEREFORE, Home Credit Corporation prays unto the Court:

1. That the Motion to Use Cash Collateral and to Allow Substitution of Collateral be denied.
2. That it have a hearing on this matter.
3. That it have such other and further relief as to the Court may seem just and proper.

This the 26th day of September, 2011.

s/William F. Hill

William F. Hill  
State Bar No. 10929  
Attorney for Home Credit Corporation  
Post Office Box 2517  
Greenville, North Carolina 27836  
Telephone: 252-355-4277  
Facsimile: 252-355-2797

CERTIFICATE OF SERVICE

The undersigned, of P.O. Box 2517, Greenville, North Carolina 27836, certifies:

That I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age;

That on this date I served copies of the foregoing RESPONSE TO MOTION TO USE CASH COLLATERAL AND TO ALLOW SUBSTITUTION OF COLLATERAL on the following parties by first class mail at their last known address:

John T. Orcutt  
Attorney for Debtors  
6616-203 Six Forks Road  
Raleigh, NC 27615

Richard M. Hutson, II  
Chapter 13 Trustee  
300 W. Morgan St., Suite 425  
Post Office Box 3613  
Durham, NC 27702

Sherena Michelle McDonald Lockhart  
19761 Pineneedle Circle  
Laurinburg, North Carolina 28352

Robert Stancil Lockhart, Jr.  
19761 Pineneedle Circle  
Laurinburg, NC 28352

This the 26th day of September, 2011.

s/William F. Hill  
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